

# ATTACHMENT 1

## COMPLAINT FORM

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FILED

(for filers who are prisoners without lawyers) JUN -6 P 1:04

IN THE UNITED STATES DISTRICT COURT  
FOR THE Eastern DISTRICT OF Wisconsin

(Full name of plaintiff(s))

Hussein Khalaf

vs

Case Number:

**24-C-0712**

(Full name of defendant(s))

Saint Louis University

(to be supplied by clerk of court)

### A. PARTIES

1. Plaintiff is a citizen of Iraq, and is located at  
(State)

Dodge County Jail, 216 W. Center St, Juneau, WI 53039  
(Address of prison or jail)

(If more than one plaintiff is filing, use another piece of paper).

2. Defendant Saint Louis University  
(Name)

is (if a person or private corporation) a citizen of Missouri  
(State, if known)

and (if a person) resides at \_\_\_\_\_  
(Address, if known)

and (if the defendant harmed you while doing the defendant's job)

worked for \_\_\_\_\_  
(Employer's name and address, if known)

(If you need to list more defendants, use another piece of paper.)

## B. STATEMENT OF CLAIM

On the space provided on the following pages, tell:

1. Who violated your rights;
2. What each defendant did;
3. When they did it;
4. Where it happened; and
5. Why they did it, if you know.

The Plaintiff Hussein Khalaf (now an inmate at Dodge County Jail  
Juneau, Wisconsin for immigration purposes) is seeking justice from the  
Unfair and unjust expulsion from Saint Louis University. Hussein was  
arrested by FBI on 1/24/2022 when he was coming back from visiting  
his family in Iraq and was charged with a charge that involved his  
ex-girlfriend "Emily Maxwell" who was student at Saint Louis University  
as well. Hussein ended up spending 10 months in jail (1/24/2022 to  
12/2/2022) and asked his friend Mustafa Attallah to submit  
a leave of absence to SLU because he won't be able to attend

Note: I am still fighting my misdemeanor charge. And I have asked honorable Henry Autrey to vacate it. (See 4:24-CV-00651-HEA). Thanks

Spring Semester of 2022. The arrest news was everywhere on the internet and different news channels and the University. In May, 2022 Hussein asked his friend Mustafa to file another leave of absence but the University told him it was denied and I should call them on 6/17/2022. When I called SLU, they said I was expelled on 5/7/2022 and the decision is final. When I tried to explain that I still did not even go to trial, they said this does not have anything to do with my charges, it's because I did not come to the hearings!!! I said, how do I come to the hearings when I was never notified and besides I am in jail? SLU said "we sent you emails" and we do not know you are in jail!!! I explained how phones are not allowed in jails and told them they are lying because my arrest was on the news, besides the fact that the expulsion hearings started 1/26/2022 (right after I was arrested). On 12/14/2022 I went to SLU hoping they will listen to me. The President assistant asked me to write a letter explaining my situation and start with the dean of students office. I made an appointment with the dean of students office for the next day at 2 PM, but instead of meeting me she called the police and they escorted me with all humiliation. That happened because SLU officials decided to believe a white girl (who is a sex worker) and ignored to listen even to a guy named "Hussein" from "Iraq".

C. JURISDICTION

☒ I am suing for a violation of federal law under 28 U.S.C. § 1331.

OR

☐ I am suing under state law. The state citizenship of the plaintiff(s) is (are) different from the state citizenship of every defendant, and the amount of money at stake in this case (not counting interest and costs) is \$\_\_\_\_\_.

D. RELIEF WANTED

Describe what you want the court to do if you win your lawsuit. Examples may include an award of money or an order telling defendants to do something or stop doing something.

I am humbly asking this respected Court to vacate the expulsion Order of Saint Louis University and give me a chance to show my innocence of the wrongful accusations which Emily Maxwell (The immoral person who is known among her peers and the University for her sexual relationships even with her advisors at the University and that's a fact). Saint Louis University has to be held responsible for the damage they did to my reputation and to their discrimination against me (The president assistant told me "remember, Iraq and USA are not friends !!!). No one should be expelled without a hearing where they can defend themselves. And, I am humbly asking this Court to order SLU to look into my accuser immorality and answer why they ignored it in their hearings. Thanks.

E. JURY DEMAND

☒ Jury Demand - I want a jury to hear my case  
OR

☐ Court Trial - I want a judge to hear my case

Dated this 27 day of 5 2024.

Respectfully Submitted,

Husein  
Signature of Plaintiff

220 869 585  
Plaintiff's Prisoner ID Number

Dodge County Detention Facility, 216 W. Center St.

Juneau, WI 53089  
(Mailing Address of Plaintiff)

(If more than one plaintiff, use another piece of paper).

**REQUEST TO PROCEED IN DISTRICT COURT WITHOUT PREPAYING THE FILING FEE**

☒ I **DO** request that I be allowed to file this complaint without paying the filing fee. I have completed a request to proceed in the district court without prepaying the fee and attached it to the complaint.

☐ I **DO NOT** request that I be allowed to file this complaint without prepaying the filing fee under 28 U.S.C. § 1915, and I have included the full filing fee with this complaint.